

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

MUBASHIR KHALIF HUSSEN,  
MAHAMED EYDARUS, and JAVIER  
DOE  
*on behalf of themselves and others  
similarly situated,*

Plaintiffs,

v.

KRISTI NOEM, *in her official capacity as  
Secretary of the U.S. Department of  
Homeland Security*; U.S. DEPARTMENT  
OF HOMELAND SECURITY; U.S.  
IMMIGRATION AND CUSTOMS  
ENFORCEMENT; TODD M. LYONS, *in  
his official capacity as Acting Director of  
U.S. Immigration and Customs  
Enforcement*; DAVID EASTERWOOD, *in  
his official capacity as U.S. Immigration  
and Customs Enforcement Field Office  
Director for St. Paul, Minnesota*; U.S.  
CUSTOMS AND BORDER  
PROTECTION; RODNEY S. SCOTT, *in  
his official capacity as Commissioner of  
U.S. Customs and Border Protection*; U.S.  
BORDER PATROL; MICHAEL W.  
BANKS, *in his official capacity as Chief  
of U.S. Border Patrol*; and GREGORY  
BOVINO, *in his official capacity as  
Commander-at-Large of U.S. Border  
Patrol,*

Defendants.

Case No. 0:26-CV-00324-ECT-ECW

**DECLARATION OF  
RAUL AGUIRRE CASTREJON**

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I, Raul Aguirre Castrejon, pursuant to 28 U.S.C § 1746, declare as follows:

1. My name is Raul Aguirre Castrejon. I have been a lawful permanent resident since 2025.

2. On January 10, 2026 I was getting groceries with my niece in Montecello. We went Walmart.

3. After we got groceries we went to my house to get something and we were followed by two cars a black Cherokee SUV and another white SUV with Florida plates.

4. They were following us. When we switched lanes they switched lanes as well.

5. We believed they were ICE. I was a passenger and my niece, who is a US citizen, was driving. She was scared. I tried to calm her down.

6. I thought about calling the cops.

7. The black Cherokee went ahead of us to box us in. Again, whenever we switched lanes, they would continue to do the same.

8. I decided that we should get off the road. As we were trying to exit, the black Cherokee nearly ran us off the road. They swerved in front of us and my niece had to swerve to not get hit.

9. They parked in front of us and my niece slammed on the brakes so she wouldn't hit them.

10. The men came up and demanded that we get out of the car. They pulled down the door window and opened the door and pulled me out of the car and 5-6 guys put handcuffs on me and tried to push me into a Cherokee.

11. Someone else reached into the car and turned off the engine and took the keys.

12. I kept yelling that I was legal. An officer said "you're not from here. Where are you from?"

13. I asked them not to yell at me. I again told them I was legal.

14. They grabbed my wallet and phone and turned off my phone so the recording stopped.

15. The handcuffs were very tight. They kept pushing me into the car.

16. Seven months ago I had surgery on my back and they made it much worse. I go to a physical therapist, and this really wrecked my back.

17. They were pointing weapons and yelling at me to shut up.

18. After a few minutes someone told the men to let me go.

19. They gave my phone to my niece.

20. They said they pulled us over because the car we were driving was being driven by a woman and the registered owner was a man.

21. My niece was crying and nearly hysterical.

22. I was absolutely distressed and shaken and emotionally traumatized. I was not physically hurt except for the lasting scrapes from the handcuffs.

23. My wallet had a \$100 bill, two \$50 bills, one \$20, one \$10, one \$5. They took everything but the 100 and 5 dollar bills. They also took my insurance policy card as well.

24. I believe that they stopped us because of the color of my skin and my appearance.

25. Even though I am a lawful permanent resident and I was carrying proof of that with me, ICE agents still used force against me and arrested me.

26. This experience terrified me and continues to make me angry. Despite doing everything that I am supposed to do, I fear that I am at risk of being targeted again and subjected to future detention and arrest.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: Jan 15, 2026

  
Raul Aguirre Castrejon (Jan 15, 2026 17:41:47 CST)

Raul Aguirre Castrejon